

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of

Standardizing Program Reporting       )  
Requirements                                )  
for Broadcast Licensees                    )  
  )

MB Docket No. 11-189

**OPPOSITION TO REQUESTS FOR EXTENSION OF DEADLINES FOR FILING  
COMMENTS AND REPLY COMMENTS**

The Public Interest Public Airwaves Coalition, including the Benton Foundation,<sup>1</sup> Campaign Legal Center, Common Cause, Free Press, Media Access Project, New America Foundation, and the Office of Communication of the United Church of Christ, Inc. (collectively, “PIPAC” or the “Coalition”), respectfully submits the following Opposition to two Motions for Extension filed by State Broadcasters Associations (State Associations)<sup>2</sup> and the Radio and Television News Directors Associations (RTNDA)<sup>3</sup> in response to the Commission’s Notice of Inquiry regarding Standardizing Program Reporting Requirements for Broadcast Licensees.<sup>4</sup>

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<sup>1</sup> The Benton Foundation is a nonprofit organization dedicated to promoting communication in the public interest. These comments reflect the institutional view of the Foundation and, unless obvious from the text, are not intended to reflect the views of individual Foundation officers, directors, or advisors.

<sup>2</sup> State Broadcasters Associations Joint Motion for Extension of deadline for Filing Comments and Reply Comments, filed MB Dkt 11-189 (Jan. 4, 2012) (State Associations Motion”).

<sup>3</sup> Radio Television Digital News Association Motion for Extension of deadline for Filing Comments and Reply Comments, filed MB Dkt 11-189 (Jan. 5, 2012) (RTNDA Motion”).

<sup>4</sup> *In the Matter of Standardizing Program Reporting Requirements for Broadcast Licensees*, Notice of Inquiry, MB Docket No. 11-189, FCC 11-169 (rel. Nov. 14, 2011) (“NOI” or “Standardized Program Report Proceeding”).

Both the State Associations and RTNDA filings request extending the initial comment deadline from January 17, 2012 to February 7, 2010, and extending the reply comment deadline from January 30, 2012 to February 21, 2012. State Associations argue that an extension of time is necessary “due to the recent federal holidays and the fact that many interested parties were traveling and/or out of the office throughout the week between Christmas and New Year’s Day, and many continuing into this week.” *State Associations Motion* at 2. They also argue that an extension is warranted because the deadline for initial comments in the Standardized Reporting Proceeding coincides with the deadline for reply comments in a related, though separate proceeding on broadcasters’ public files. *Id.* at 3. The RTNDA requests an extension explaining that, due to the organization’s new leadership and staff changes, it requires more time to consider the issues presented in the Notice of Inquiry. *RTNDA Motion* at 2.

As public interest groups with extremely limited resources ourselves, PIPAC is sympathetic to the State Associations and RTDNA concerns. However, we do not believe that the reasons presented by either party are sufficient to warrant an extension or to delay further action in this proceeding.

As a threshold matter, “[i]t is the policy of the Commission that extensions of time shall not be routinely granted.” 47 C.F.R. § 1.46(a). While the Christmas and New Year’s holidays may put some strain on commenters’ ability to prepare filings in this proceeding, we believe that the deadline of January 17<sup>th</sup> – which is over two weeks removed from the federal holiday on January 2<sup>nd</sup> – allows sufficient time for interested parties to weigh-in. Additionally, the convergence of the deadline for initial comments in the Standardized Program Reporting docket and Reply Comments in Online Public File

docket<sup>5</sup> is the consequence of the Commission's previous grant of a broadcaster extension request in the latter proceeding,<sup>6</sup> which has provided interested parties with additional time to prepare their filings.

Indeed, by January 17<sup>th</sup> comment deadline, interested parties will have had over two months to review and consider the issues presented in the Standardized Reporting NOI. While the NOI was not published in the Federal Register until December 15, 2011, the Commission released the text of the item on November 14, 2011. Furthermore, and to which both State Associations and RTNDA allude in their motions, the NOI stems from a broader proceeding which has been pending for over a decade.<sup>7</sup> As consequence, most if not all interested parties are already extremely familiar with and have weighed-in on the same or substantially similar issues presented in this docket.

In the alternative, if the Commission is inclined to extend any deadlines in this proceeding, PIPAC requests that it limit any extra time granted to the reply portion of the comment cycle. As demonstrated above, interested parties have had ample time to review

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<sup>5</sup> *In the Matter of Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Order on Reconsideration and Further Notice of Proposed Rulemaking, MB Docket No. 00-168, FCC 11-162 (rel. Oct. 27, 2011).

<sup>6</sup> *See Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Order, DA 11-2089 (rel. Dec. 29, 2011) granting the National Association of Broadcasters Motion for Extension of Time, filed MB Dkt 00-168 (Dec. 27, 2011).

<sup>7</sup> *In the Matter of Public Interest Obligations of TV Broadcast Licensees*, Notice of Inquiry, 14 FCC Rcd 21633 (1999); *Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Notice of Proposed Rulemaking, 15 FCC Rcd 19816 (2000); *In the Matter of Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Report and Order, 23 FCC Rcd 1274 (2007), *on recon.*, *In the Matter of Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Order on Reconsideration and Further Notice of Proposed Rulemaking, MB Docket No. 00-168, FCC 11-162 (rel. Oct. 27, 2011).

the item and prepare initial comments in response to the NOI. However, it is possible that if a large numbers of parties present new and/or extensive arguments in their initial comments a modest extension of seven days may be warranted on reply. Such an extension, if granted, would shift the current reply comment deadline from January 30, 2012 to February 6, 2012.

WHEREFORE, the Public Airwaves Public Interest Coalition respectfully requests that the Commission deny the State Broadcaster and RTNDA Motions for Extension in the above captioned proceeding.

Respectfully Submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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*On behalf of the Public Interest, Public  
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January 6, 2012